

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	4:16CR00528
)	
)	
TODD BECKMAN,)	
)	
Defendant.)	

**DEFENDANT’S MOTION TO RECONSIDER DETENTION ORDER AND SET
BOND**

COMES NOW Defendant, Todd Beckman, by and through counsel, Travis L. Noble, Jr., and hereby states:

1. Defendant is currently charged in Count I with Kidnapping.
2. Defendant has been incarcerated while this case has been pending since December, 2016.
3. Defendant is the father to young children, whom he supports financially and helps care for and raise the children. Defendant’s child’s mother relies on Defendant to provide for the children.
4. Defendant is gainfully employed by BAM Brands and has numerous employees that rely on Defendant. Defendant could resume employment if permitted to be released upon bond.
5. Defendant resides in St. Louis, Missouri and has numerous, if not all, ties to Missouri, residential and familial.
6. Defendant would voluntarily submit to home detention and/or house arrest if he were released pending pretrial.

7. Defendant has relatively no criminal history, if any.
8. The Court has available to it numerous potential bond conditions to make sure the community is safe.

WHEREFORE, counsel respectfully requests that this Court reconsider its Detention Order from December 9, 2016, and order that a reasonable bond be set in this case pending trial, and for any other action the Court deems just and proper under the circumstances.

Respectfully Submitted,

SINDEL, SINDEL & NOBLE, P.C.

e/s Travis L. Noble, Jr.
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Certificate of Service

I hereby certify that on this day of 3rd day of May, 2017, a copy of the foregoing Motion to Reconsider Detention Order and to Set Bond was filed electronically with the Clerk of the Court in the United States District Court, Eastern District of Missouri, and to be served by the operation of the Court's electronic filing system upon all attorneys of record, including John Davis, AUSA.

e/s Travis L. Noble, Jr.